

Submission No: 31

Your ref: PA/1/7B:O63429: I67519
Our ref: Guy Thompson
Enquiries:

28 June 2005

The Secretary
Joint Committee of Public Accounts and Audit
Parliament House
Canberra
ACT 2600

Dear Russell

REVIEW OF AVIATION SECURITY IN AUSTRALIA

This letter is forwarded in response to the request for public submissions made by the JCPAA in relation to the current review into Aviation Security in Australia.

I not with intent the terms of reference of the committee and provide the following comments on the current security regime and on measures currently being considered as outlined in the joint media release by, The Hon John Anderson MP, The Hon Philip Ruddoch MP and The Hon Christopher Ellison.

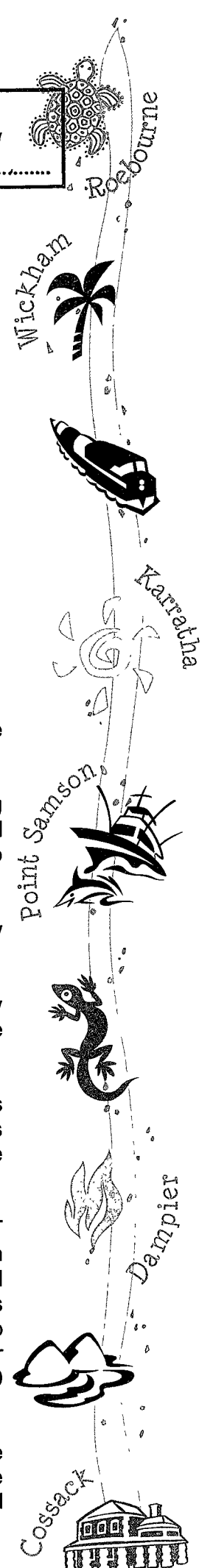
These comments are made in respect of Karratha Airport in Western Australia, a facility which is owned and operated by the Shire of Roebourne.

The impact of the new security regulations on this previously security controlled facility has been substantial and the following items relate to the new regulations and the implementation process.

Firstly I would like to state that the 2-year transition period for already controlled airports is greatly appreciated and is considered the absolute minimum for changes of this magnitude. As with any new legislation there are always likely to be areas which are problematic and the new security regulations are no exception.

The first topic relates to the requirement for ASIC cards at regional ports where RPT services operate. This new system in our case has required the development of an ASIC program, the definition of the various airside / landside boundaries on a gazetted plan. The cost of this agreement to compliance by all personal accessing airside is approximately \$200 per person to produce and supply on ASIC. Estimates are that up to 100 cards will be required in the initial distribution together with the renewals for existing staff and new staff commencing at the Airport. Annual average costs \$10,000 to \$15,000.

The more significant cost associated with the implementation of an ASIC program is the ongoing adherence and operation. In order to maintain the integrity of the system we will require an additional staff member to co-ordinate the ASIC card issuing process and



the operation of visitor cards for contractors and others entering the airside area for airport maintenance or activities at one of the 15 operators based at Karratha Airport. The cost of this service 24 hours, 7 days per week is estimated at \$60,000 per annum.

Another interesting issue with respect to ASIC cards relates to the ability to deal with a current employee industrially if they fail the ASIC process and therefore are unable to continue undertaking their duties. Whilst the security outcome may be positive the outcome in a regional port may be significant with problems for the organisation and the unlucky employee and their family.

The next issue with respect to the implementation of the new regulations relates to the RAFFP scheme which was and is very beneficial to the so-called new entrant airports. These facilities have been provided with technical assistance from both the Australian Airports Association and the focussed staff at the Department and funding for the required infrastructure enhancements for their airports. In many cases these enhanced facilities at the new entrant airports far exceed those present at the previously categorised airports, which by nature are considered a higher security risk, based on the previous standard defined by aircraft size.

If we then look at the scenario for Karratha Airport, we have been unable to access the technical advice required because these department staff have been occupied with 144 new airport entrants, new sea port portfolios, a new set of regulations and a significant increase in staff, most of which have little or no experience. Despite the best efforts of DOTARS staff we are still struggling to gain the information required to transition our security program to a new Transport Security Program.

The bigger issue is however that we cannot access any of the funding made available for the new entrants to upgrade the security provisions at what was previously considered a higher risk port. Instead this money will be spent on CCTV systems and 2.4 metre fences at ports serviced by nine seat aircraft. Whilst the increase in security measures is in line with the TSP for these airports, the cynic in me questions whether all of these measures would be installed were the airports to be funding the measures themselves. Of greater concern is the potential for the assessment process undertaken by DOTARS to gradually ratchet up security standards in the unfunded ports. The scenario may be as simple as an audit at a port serviced by a small, say 9 seat RPT service which has apron CCTV and a 2.4 metre fence. Whilst we can all argue about where the level should be in relation to security, the potential inconsistency is of concern where all upgrades need to be funded from airport income alone.

There are many other changes called for in the new regulations and to date I am unsure how they will apply to Karratha Airport. The current position is that it is related to a risk assessment process. This is clearly the best approach because it eliminates the one-size fits all approach. The problem is, based on history there have been no security incidents of any magnitude at Karratha Airport and those that have occurred have been handled successfully by the local arrangements contained in the current (not to be transitioned) security program. International incidents are placing pressure on aviation within Australia, in particular security in aviation, this may be necessary in the major ports in Australia, it does however appear to be somewhat over the top in many regional

airports. It would seem that what is required at Sydney Airport is the basis for what is likely to be required at Karratha Airport.

At a recent briefing by DOTARS staff the potential for a further increase in security at regional ports resulting from public concern about perceived illegal activity behind the scenes gives cause for great concern as the operator of a major regional port.

The proposal includes the following potential measures:

- I. Review of all ASIC holders
This will have no immediate effect as we currently have not issued ASIC cards. Therefore this is of no concern.
- II. Increased routine ASIC display checks
As for item (i)
- III. Removal of grandfathering provision for ASIC holders
As we haven't issued ASIC's as yet this also is not a problem, it does however link to the issue mentioned above relating to industrial relations and existing employees who may fail an ASIC process.
- IV. Perimeter Security – (Hardened Infrastructure)
This presumably relates to fencing and an increase in its size and probably visual barrier characteristics. It is well understood that approximately trained personnel can gain entry to any fence in under 20 seconds and an average person in less than one minute.
It would therefore seem that increased fencing is more about perceived security than real security impact. The fence at Karratha which is a stock fence, established to meet the CASA safety requirements for animal control is some 7.5 kilometres in length. The majority of which is not visible from a public road or from the terminal. This fence has however managed to prevent any security incursions since its installation over 15 years ago. As such an increase in fence height to the 2.4 metre mark with barbed wire on the top at an estimated cost of \$750,000 is considered excessive even if funded from an external source. If this were to be funded from airport revenue the current per passenger charge would need to increase by 40%.
- V. Perimeter Security – Access Points
It is understood that this proposal may involve the requirement to inspect all personnel, goods and vehicles entering and exiting the airside area. If this system were to include x-ray and ETD as well as vehicle inspections, a crew of 5 personnel would be required to operate 24 hours, 7 days plus 2 to patrol or alternatively the full crew during the main operating hours and a 2 person crew only after hours to patrol and inspect any persons requiring access.

For option (1) the full 24-hour access control the cost is \$3 million per year to operate plus the capital cost which are likely to be between \$500,000 and \$1000,000.

Option (2) is somewhat cheaper at \$2.3million per year to operate; capital costs would be the same.

These costs relate to the screening or inspection service only and make no allowance for the time cost on aircraft operators who cannot turn aircraft around as quickly because vehicles such as fuel trucks take an extra 20 minutes to be searched before being able to access the aircraft.

If the inspection costs only were applied and were to be funded by the airport passenger fees would increase by 220 to 250%. Add this to the increased fencing and the current costs of the new security regulations and costs per passenger would rise by over 300%.

It would appear the latest raft of security proposals have little to do with aviation security but more to do with basic criminality at airports. This is clearly due to mounting public opinion flowing from recent well-publicised events that can be linked to airports. Clearly airports like train stations, bus stations and shopping centres will on occasion attract the criminal element. This however is clearly the role of State Police Services not the domain of airport operators in a quasi – police role. The costs of the proposed measures are disproportionate to the risk at a regional port like Karratha.

If we were to have a major crime ring operating at our airport they would only be able to operate between Perth and Karratha and possibly Port Hedland both destinations are accessible by road and significantly great quantities of illegal materials could be transported undetected everyday.

The proposed measures may be applicable to a major gateway airport but they are clearly inappropriate at a regional port.

A further issue relates to the fact that if we were to increase fence height and inspect all personnel accessing airside and their goods and vehicles. There would still be over 500 bags potentially full of illegal substances going from landside to airside each day in the checked baggage of passengers. It would therefore be a natural extension into checked bag screening which will also add significant costs to operations. This has not been costed at this stage.

The new aviations security regulations are a risk-based process that allows local situations to be factored into the overall security model.

At Karratha Airport we have not had any significant security issues in at least the last 10 years that I have personally been involved with the airport. The current fencing and security regime has catered well. Whilst it is acknowledged that worldwide there is a heightened awareness of security and that improvements should be made. I would argue that the relative risk at Karratha Airport has not changed substantially and therefore quantum leaps in security provisions are not required from an aviation security perspective. If the changes are focused on criminal activity rather than aviation security then the issue is considered one for the State Authority i.e. the Police Service. Clearly these additional responsibilities would need to be resourced with funds from the State.

We look forward to assistance from DOTARS in the transition phase for the new security regulations and to playing our part in aviation security for Australia applied at the appropriate level here at Karratha Airport.

I thank you for the opportunity to comment.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Guy', written in a cursive style.

Guy Thompson
Director of Technical & Development Services / Airport Manager